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*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
PURDUE PHARMA L.P., <i>et al.</i> ,	: Case No. 19-23649 (RDD)
	:
Debtors ¹ .	: (Jointly Administered)
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**NINETEENTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC
COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF
APRIL 1, 2021 THROUGH AND INCLUDING APRIL 30, 2021**

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	April 1, 2021 – April 30, 2021
Total Amount of Fees Incurred:	\$170,295.00
Total Fees Requested (80%):	\$136,236.00
Total Reimbursement of Expenses Incurred:	\$17.00
Total Reimbursement of Expenses Requested (100%):	\$17.00
Total compensation and Reimbursement Requested in this Statement:	\$136,253.00
This is Applicant's:	Nineteenth Monthly Fee Statement

Pursuant to the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals*, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Nineteenth Monthly Fee Statement (the "Fee Statement") for the period of April 1, 2021 – April 30, 2021 (the "Statement Period").

Itemization of Services Rendered and Disbursements Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$170,295.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$136,236.00.

2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,243.22². The Blended hourly rate of all paraprofessionals is \$325.00³. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.

3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$17.00 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.

4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors.

Notice

5. Applicant will provide notice of this Fee Statement in accordance with the Interim Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad hoc committee of governmental and other contingent litigation claimants, respectfully requests (i) compensation in the amount of \$136,236.00 which is equal to 80% of the total amount of reasonable compensation for actual, necessary legal services that Applicant incurred in

² The blended hourly billing rate of \$1,243.22 is derived by dividing the total fees for attorneys of \$170,197.50 by the total hours of 136.9.

³ The Blended hourly billing rate of \$325.00 for paraprofessionals is similarly derived by dividing the total fees for paraprofessionals of \$97.50 by the total hours of .3.

connection with such services during the Statement Period (*i.e.*, \$170,295.00) and (ii) payment of \$17.00 for the actual, necessary expenses that Applicant incurred in connection with such services during the Statement Period.

Dated: July 15, 2021
New York, New York

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski
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*Co-Counsel to the Ad Hoc Committee of
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EXHIBIT A

Fees By Project Category

**SUMMARY OF COMPENSATION BY PROJECT CODE
FOR THE STATEMENT PERIOD**

Project Code	Project Category	Total Hours	Total Fees
PU04	Case Administration	7.5	\$7,975.00
PU05	Claims Analysis	1.8	\$2,368.50
PU06	Employment and Fee Applications	.7	\$455.50
PU08	Litigation: Contested Matters, Adversary	3.8	\$5,168.50
PU09	Meetings and Communications w/ AHC	10.3	\$12,400.00
PU11	Plan & Disclosure Statement	113.1	\$141,927.50
	TOTALS:	137.2	\$170,295.00

EXHIBIT B

Professional and Paraprofessional Fees

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1400.00	94.4	\$132,160.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$895.00	42.5	\$38,037.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$325.00	.3	\$97.50
	TOTAL		137.2	\$170,295.00

EXHIBIT C

Time Detail

OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002
Matter Name: CHAPTER 11
Billing Partner: RL STEHL

July 14, 2021
BILL NO. 217694

For Services Rendered Through April 30, 2021:

Phase: PU04	CASE ADMINISTRATION
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/21 JSF	Telephone Call(s) Participate/Listen to Omnibus Hearing on NAS Motion and Insurance Adversary	2.00	1,790.00
04/21/21 JSF	Examine Documents Review of Case Updates and Recently Filed Motions for Hearing	1.20	1,074.00
04/21/21 JSF	Examine Documents Participate Telephonically in Omnibus Court Hearing	1.50	1,342.50
04/21/21 MLC	Court Appearance - General Attended omnibus hearing	2.50	3,500.00
04/29/21 JSF	Examine Documents Review of UST Settlements with 3 Law Firms re: Disclosure Issues	.30	268.50
TOTAL PHASE PU04		7.50	\$7,975.00

Phase: PU05	CLAIMS ANALYSIS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/15/21 MLC	Analysis of Memorandum Review and analysis of Joint Objection of Distributors, Manufacturers and Pharmacies to Debtors' Motion re Omnibus Claims Objection Procedures	.90	1,260.00
04/30/21 JSF	Examine Documents Review of States' Consolidated Proof of Claim re: State Request	.30	268.50
04/30/21 MLC	Correspondence Correspondence with state group re medicaid breakdown in consolidated proof of claim	.30	420.00
04/30/21 MLC	Correspondence Correspondence with Brattle re medicaid breakdown by states in consolidated proof of claim	.30	420.00
TOTAL PHASE PU05		1.80	\$2,368.50

Phase: PU06 EMPLOYMENT & FEE APPLICATIONS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/21/21 JSF	Examine Documents Review of Proposed Fee Order and Amounts	.40	358.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/21/21	Review/analyze	.30	97.50
JKH	Review proposed fee order		
TOTAL PHASE PU06		.70	\$455.50

Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/21	Court Appearance - General	2.20	3,080.00
MLC	Pre-trial proceeding in Insurance Adversary		
04/06/21	Examine Documents	.30	420.00
MLC	Reviewed summary of proceedings re adversary proceeding hearing		
04/16/21	Examine Documents	.30	268.50
JSF	Review of NCSG Objection to Continuation of Preliminary Injunction		
04/30/21	Correspondence	.40	560.00
MLC	Correspondence from Gilbert firm summarizing upcoming arguments in insurance adversary proceeding		

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/21 MLC	Analysis of Memorandum Review of draft response by Gilbert firm re certain jurisdictional issues raised in adversary proceeding	.60	840.00
TOTAL PHASE PU08		3.80	\$5,168.50

Phase: PU09	MEETINGS & COMMUNICATIONS W/ AD HOC
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/07/21 JSF	Telephone Call(s) Participate in Weekly Meeting of AHC and Professionals	1.50	1,342.50
04/07/21 MLC	Conference call(s) Attended weekly AHC meeting	1.60	2,240.00
04/07/21 MLC	Prepare for Meeting Prepared for meeting with AHC by reviewing and revising agenda	.30	420.00
04/14/21 JSF	Telephone Call(s) Weekly Conference Call with Entire AHC and Professionals - Update on Matters	1.30	1,163.50
04/14/21 MLC	Conference call(s) Weekly meeting with AHC and counsel	1.40	1,960.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/15/21 MLC	Conference call(s) Conference call with State subgroup and AHC counsel re plan strategy and next steps	.70	980.00
04/17/21 MLC	Correspondence Correspondence with States subcommittee re request for preparation of certain documents for distribution to states	.30	420.00
04/29/21 JSF	Telephone Call(s) Participate in Weekly Call of AHC	1.20	1,074.00
04/29/21 MLC	Conference call(s) Weekly meeting to review status of various pending open issues	2.00	2,800.00
TOTAL PHASE PU09		10.30	\$12,400.00

Phase: PU11

PLAN & DISCLOSURE STATEMENT

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/21 JSF	Examine Documents Review of Motion of Debtors to Enter Into MSGE Term Sheet	.40	358.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/21 MLC	Examine Documents Review and analysis of debtors' motion to enter into MSGE term sheet including payment of attorney fees	.90	1,260.00
04/01/21 MLC	Correspondence Correspondence with AHC counsel and state subgroup re need to modify IR terms for NewCo agreement	.60	840.00
04/01/21 MLC	Correspondence Correspondence with NCSG re concerns with various provisions in draft plan and term sheet	.80	1,120.00
04/01/21 MLC	Examine Documents Analyzed blackline of proposed changes and comments by NCSG to draft governance term sheet	1.10	1,540.00
04/02/21 JSF	Examine Documents Updated Abatement Term Sheet re: Allocation and Use of Abatement Funds	1.10	984.50
04/02/21 JSF	Examine Documents Review of Draft NOAT Trust Document in Connection with Plan	1.30	1,163.50
04/02/21 JSF	Examine Documents Review of Draft Plan of Reorganization and Possible Revisions	1.80	1,611.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/21 MLC	Analysis of Memorandum Review of revised abatement term sheet re allocation and use of abatement funds	2.20	3,080.00
04/02/21 MLC	Analysis of Memorandum Reviewed draft plan of reorganization and proposed revisions	2.20	3,080.00
04/02/21 MLC	Correspondence Correspondence with counsel for NCSG and MSGGE re sharing of working drafts of various agreements	.70	980.00
04/04/21 MLC	Examine Documents Review of FTI/HL draft of value analysis of cash flow to NOAT	1.10	1,540.00
04/05/21 JSF	Examine Documents Review of Illustrative Net Distributable Value Analysis Prepared by Financial Advisors	.40	358.00
04/05/21 JSF	Examine Documents Review of NCSG Mark-Up of Governance TS and Disclosure Statement	1.60	1,432.00
04/05/21 MLC	Correspondence Correspondence among AHC counsel analyzing FTI/HL valuation analysis	.90	1,260.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/05/21 MLC	Analysis of Memorandum Continued review of markup by NCSG of governance term sheet and disclosure statement	2.10	2,940.00
04/06/21 JSF	Examine Documents Review of Update on Proposed Distribution Timetable and Related Issues	.60	537.00
04/06/21 MLC	Examine Documents Review of revised draft of distribution timetable	.70	980.00
04/06/21 MLC	Correspondence Correspondence with FTI/HL and AHC counsel re continued analysis of valuation of cash flow to NOAT	1.10	1,540.00
04/07/21 JSF	Examine Documents Review of Draft of Amended Plan of Reorganization from Debtors	.80	716.00
04/07/21 JSF	Examine Documents Review of Draft of Amended Governance Term Sheet from Debtors	.30	268.50
04/07/21 MLC	Examine Documents Reviewed draft of amended governance term sheet provided by debtors	.60	840.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/07/21 MLC	Examine Documents Review of revised plan provided by debtors	1.40	1,960.00
04/07/21 MLC	Correspondence Correspondence with debtors' counsel re certain tax revisions and consequences	.30	420.00
04/07/21 MLC	Examine Documents Review of NCSG proposed revisions to solicitation documents	.90	1,260.00
04/08/21 JSF	Telephone Call(s) Participate in Call with Plan Negotiation Group re: Revised Plan and Open Issues	1.10	984.50
04/08/21 JSF	Examine Documents Review of Revised Net Distributable Value Analysis	.30	268.50
04/08/21 JSF	Examine Documents Review of Revised Proposed Amended Plan and Update to Open Issues List	1.80	1,611.00
04/08/21 MLC	Conference call(s) Conference call with AHC counsel re proposed revisions to plan	1.00	1,400.00
04/08/21 MLC	Conference call(s) Conference call with certain state representatives and AHC counsel re strategy for speaking with certain States	.70	980.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/21 MLC	Review Plan of Reorganization Reviewed and analyzed proposed changes to plan of reorganization prepared by DPW	3.80	5,320.00
04/08/21 MLC	Analysis of Correspondence Reviewed and analyzed correspondence with NCSG re demands	.60	840.00
04/09/21 JSF	Examine Documents Review of Revised Debtor Draft of Proposed Settlement Agreement for Payment Terms with Sacklers	.40	358.00
04/09/21 MLC	Conference call(s) Conference call with AHC team re NOAT/TAFT agreements and revised abatement TS	1.00	1,400.00
04/09/21 MLC	Examine Documents Reviewed revisions to settlement agreement with Sacklers	2.10	2,940.00
04/10/21 MLC	Correspondence Correspondence with AHC re call with Jersey counsel	.20	280.00
04/11/21 JSF	Examine Documents Review of Revised Abatement Term Sheet	.50	447.50
04/11/21 MLC	Examine Documents Review of comments to plan by UCC	1.20	1,680.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/21 MLC	Correspondence Review of agenda and questions for Jersey counsel	.30	420.00
04/12/21 JSF	Telephone Call(s) Telephone Call with AHC, UCC and Jersey Counsel re: Issues Relevant to Jersey Law	.60	537.00
04/12/21 JSF	Examine Documents Review of UCC Mark-Up of Plan and Update on Open Issues List	1.80	1,611.00
04/12/21 MLC	Conference call(s) Conference call with UCC and AHC with Jersey counsel re analysis of judgment enforcement law in Jersey	.70	980.00
04/12/21 MLC	Examine Documents Continued review of comments by UCC to draft plan	1.30	1,820.00
04/13/21 JSF	Telephone Call(s) Participate in Continued Call with UCC Jersey Counsel re: Issues of Jersey Law	.70	626.50
04/13/21 JSF	Examine Documents Review Draft of TPP APP Abatement Trust Term Sheet	.20	179.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/13/21 JSF	Telephone Call(s) Call with Plan Subcommittee and Professionals re: Debtors' Revisions to Abatement Term Sheet	1.00	895.00
04/13/21 JSF	Examine Documents Review of Mark-Up of Abatement Term Sheet	.40	358.00
04/13/21 JSF	Examine Documents Review of Debtors' Disclosure Statement	1.40	1,253.00
04/13/21 MLC	Conference call(s) Continued call with Jersey counsel together with UCC and AHC re judgment enforcement under Jersey law	.80	1,120.00
04/13/21 MLC	Conference call(s) Conference call meeting with AHC counsel and certain State representatives re open Plan issues and next steps	.50	700.00
04/13/21 MLC	Analysis of Memorandum Review of proposed changes to TPP Abatement Plan	1.80	2,520.00
04/13/21 MLC	Analysis of Memorandum Review of proposed changes to abatement term sheet by DPW and UCC	1.60	2,240.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/13/21 MLC	Conference call(s) Conference call with AHC subcommittee to discuss and review abatement term sheet mark-up by DPW and UCC	1.00	1,400.00
04/14/21 JSF	Telephone Call(s) Call with Plan Subcommittee re: Continuation of Discussion on Abatement Term Sheet	.50	447.50
04/14/21 JSF	Examine Documents Review of Abatement Term Sheet Draft and Issues	.40	358.00
04/14/21 JSF	Examine Documents Review of POR and Open Issues for Plan and Governance	1.80	1,611.00
04/14/21 MLC	Conference call(s) Conference call with counsel for Debtors, Sacklers, AHC, UCC, MSGE and NCSG in which NCSG describes proposed settlement terms to Sacklers	.70	980.00
04/14/21 MLC	Analysis of Correspondence Review and analysis of correspondence from NCSG counsel re agreement with TPP and others re term sheet	.70	980.00
04/14/21 MLC	Analysis of Memorandum Review and analysis of term sheet re released parties and excluded parties	1.70	2,380.00

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04/15/21 JSF	Examine Documents Review and Analysis of Open Plan Issues and Status of NCSG Discussions	.60	537.00
04/15/21 MLC	Conference call(s) Conference call with States' working group re review of interstate allocation proposal approved by States' AGs	.90	1,260.00
04/15/21 MLC	Correspondence Correspondence with KL re their call with DPW re scheduling of disclosure statement hearing	.40	560.00
04/15/21 MLC	Analysis of Memorandum Analysis of plan document issues list prepared by KL	.90	1,260.00
04/15/21 MLC	Analysis of Memorandum Analysis of issue list prepared by KL re Sackler releases to be provided in Plan for governmental and non-governmental parties	1.40	1,960.00
04/15/21 MLC	Correspondence Correspondence with NCSG counsel and non-State representatives re State Abatement Agreement Term Sheet	.60	840.00
04/16/21 JSF	Examine Documents Review of Analysis of Sackler Settlement and Related Issues	.60	537.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/16/21 MLC	Conference call(s) Conference call with States' subgroup with DPW and Debtor re State Allocation methodology	.80	1,120.00
04/16/21 MLC	Conference call(s) Conference call with counsel and State subgroup to discuss certain fees and allocation issues with NCSG	1.00	1,400.00
04/17/21 JSF	Examine Documents Review of UCC Statement Re: Approval of MSGGE Term Sheet	.20	179.00
04/17/21 JSF	Examine Documents Review of Draft Release Provisions and List of Open Issues and Status	.40	358.00
04/17/21 MLC	Examine Documents Review of UCC statement re approval of MSGGE term sheet	.30	420.00
04/17/21 MLC	Examine Documents Review of draft of release provisions and list of open issues	.40	560.00
04/17/21 MLC	Correspondence Correspondence re sharing of drafts with various parties	.30	420.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/18/21 MLC	Correspondence Correspondence re scheduling with Jersey counsel follow up	.10	140.00
04/19/21 MLC	Correspondence Correspondence with AHC plan subcommittee re support for various arguments from prior transcripts	.80	1,120.00
04/19/21 MLC	Correspondence Correspondence from DPW re timing of filing of plan and disclosure statement and term sheets	.40	560.00
04/19/21 MLC	Examine Documents Review of agenda filed by debtors for upcoming hearing	.30	420.00
04/20/21 MLC	Conference call(s) Conference call with AHC counsel and state subgroup re plan negotiations	.70	980.00
04/20/21 MLC	Conference call(s) Conference call with NCSG, Debtors and AHC re operating injunction and document repository	1.00	1,400.00
04/20/21 MLC	Examine Documents Review of redline by KL of Sackler releases	1.30	1,820.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/20/21 MLC	Correspondence Correspondence with NCSG and AHC counsel re upcoming meetings involving injunction and document repository	.30	420.00
04/20/21 MLC	Correspondence Correspondence with Don Simon re tribal allocation matrix	.50	700.00
04/20/21 MLC	Examine Documents Review of issues list prepared and circulated by UCC	.60	840.00
04/20/21 MLC	Examine Documents Review of UCC comments to draft plan	1.60	2,240.00
04/21/21 MLC	Conference call(s) Conference call with debtors to review and discuss NOAT abatement term sheet	1.00	1,400.00
04/22/21 JSF	Examine Documents Review of Memo re: Plan Confirmation and Potential Appellate Issues	.40	358.00
04/22/21 JSF	Examine Documents Review of UST Objection to Disclosure Statement	.60	537.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/22/21 JSF	Examine Documents Review Draft of PJT Valuation Analysis and Liquidation Analyses re: Plan and Disclosure Statement	.60	537.00
04/22/21 MLC	Examine Documents Review of memorandum re plan confirmation and potential appellate issue	.50	700.00
04/22/21 MLC	Examine Documents Review of UST objection to DS	.60	840.00
04/22/21 MLC	Examine Documents Review of draft of PJT valuation analysis re plan and DS	.80	1,120.00
04/22/21 MLC	Examine Documents Review of proposed order approving DS	.60	840.00
04/22/21 MLC	Examine Documents Review and analysis of debtors' revisions to abatement term sheet	1.30	1,820.00
04/22/21 MLC	Examine Documents Review of outline of debtors' valuation and liquidation analysis	.40	560.00
04/22/21 MLC	Correspondence Correspondence with FTI/HL reviewing debtors' valuation and liquidation analysis	.40	560.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/22/21 MLC	Examine Documents Review of TDPs prepared by debtors re hospitals and TPPs	.70	980.00
04/22/21 MLC	Correspondence Correspondence with NCSG and DPW re mediation with bankruptcy judge	.20	280.00
04/23/21 JSF	Examine Documents Review of Objections to Disclosure Statement	1.60	1,432.00
04/23/21 JSF	Examine Documents Review of Debtors' Mark-Up of Abatement Trust Term Sheet	.40	358.00
04/23/21 MLC	Analysis of Memorandum Review of Public School District objection filed to disclosure statement	1.20	1,680.00
04/23/21 MLC	Examine Documents Review of DPW mark-up of certain TDPs for PIs	.90	1,260.00
04/23/21 MLC	Analysis of Memorandum Review of debtors' revisions to appellate procedures re PI TDP	.40	560.00
04/23/21 MLC	Analysis of Memorandum Review of summary of debtors' comments to abatement TS	.80	1,120.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/23/21 MLC	Examine Documents Review of various objections filed in opposition to DS	1.10	1,540.00
04/23/21 MLC	Correspondence Correspondence with mediation subgroup re debtors' revisions to TDPs	.30	420.00
04/24/21 JSF	Examine Documents Review of Filed First Amended Plan of Reorganization	1.20	1,074.00
04/24/21 MLC	Examine Documents Review of FTI/HL comments to debtors' valuation analysis	.70	980.00
04/24/21 MLC	Analysis of Memorandum Review of blackline changes in first amended plan filed by debtors	1.40	1,960.00
04/24/21 MLC	Correspondence Correspondence with states subgroup re certain changes proposed in amended plan	.40	560.00
04/24/21 MLC	Correspondence Correspondence from KL providing comparison of changes in plan and first amended plan of reorganization	.80	1,120.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/24/21 MLC	Examine Documents Review of suggested amendments to abatement term sheet	.70	980.00
04/24/21 MLC	Correspondence Correspondence with states subgroup re interstate allocation of NOAT abatement funds	.40	560.00
04/24/21 MLC	Correspondence Correspondence with mediation subgroup re debtors' correspondence with tribes re tribal allocation	.60	840.00
04/24/21 MLC	Correspondence Correspondence with mediation subgroup re MSGE proposed changes to abatement term sheet	.30	420.00
04/25/21 JSF	Examine Documents Further Review of Objections filed to Disclosure Statement	.40	358.00
04/25/21 JSF	Examine Documents Review of Further Revised and Updated Proposed Abatement Term Sheet	.40	358.00
04/25/21 JSF	Examine Documents Review of Blackline of Newly Filed Disclosure Statement for First Amended Plan	.80	716.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/25/21 MLC	Examine Documents Reviewed summary analysis prepared by KL of changes to abatement term sheet and related documents	1.10	1,540.00
04/25/21 MLC	Analysis of Memorandum Review and analysis of chart prepared by KL summarizing objections to DS and Plan	.90	1,260.00
04/25/21 MLC	Analysis of Memorandum Review of proposed revisions to abatement term sheet concerning DOJ	.60	840.00
04/26/21 JSF	Examine Documents Review of Additional Objections to Disclosure Statement - Ad Hoc Committee on Accountability and NAS Ad Hoc	.70	626.50
04/26/21 MLC	Analysis of Memorandum Review of objection filed by Ad Hoc Committee on Accountability and NAS ad hoc committee	.80	1,120.00
04/26/21 MLC	Analysis of Memorandum Review of second plan supplement	.80	1,120.00
04/27/21 MLC	Conference call(s) Call with state subgroup and AHC counsel to review pending open issues	.80	1,120.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/27/21 MLC	Conference call(s) Continued follow up call re Jersey Law issues	.60	840.00
04/27/21 MLC	Analysis of Memorandum Review of West Virginia objection to Plan	.90	1,260.00
04/28/21 JSF	Telephone Call(s) Call with AHC Professionals and NCSG Counsel re: Objections to Disclosure Statement	.50	447.50
04/28/21 MLC	Conference call(s) Conference call with AHC counsel and NCSG counsel to review West Virginia concerns and open issues	1.00	1,400.00
04/29/21 JSF	Telephone Call(s) Call with Professionals and State Representatives re: Update on Open Plan Issues	.50	447.50
04/30/21 JSF	Examine Documents Review of Updates to AHC and Recently Filed Documents,	.30	268.50
04/30/21 JSF	Examine Documents Review of Updated Letter to Debtors on Open Issues	.30	268.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/21 JSF	Examine Documents Review of NCSG Objection to Disclosure Statement	.80	716.00
04/30/21 MLC	Examine Documents Review of amended disclosure statement filed by debtors	1.30	1,820.00
04/30/21 MLC	Correspondence Correspondence by AHC with DPW re proposed plan revisions	.80	1,120.00
04/30/21 MLC	Correspondence Correspondence with States subgroup with NCSG subgroup re document repository and amendments to term sheet re same	.60	840.00
TOTAL PHASE PU11		113.10	\$141,927.50
		TOTAL FOR SERVICES	\$170,295.00

EXHIBIT D

Summary of Actual and Necessary Expenses

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE
STATEMENT PERIOD**

Expense Category	Total Expenses
Electronic Research	\$17.00
TOTAL:	\$17.00

EXHIBIT E

Expense Detail

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DISBURSEMENTS FOR YOUR ACCOUNT

Electronic Research	17.00
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TOTAL DISBURSEMENTS	<hr/> 17.00
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